# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:	Bankruptcy Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker
Debtor	Chanter 9

STIPULATION FOR ENTRY OF ORDER GRANTING THIRD ADJOURNMENT OF HEARING DATE AND EXTENSION OF THE DEADLINE TO FILE REPLY TO RESPONSE TO MOTION OF THE DETROIT FIRE FIGHTERS ASSOCIATION, IAFF LOCAL 344 ("DFFA") FOR ENTRY OF AN ORDER ENFORCING THE NOVEMBER 30, 2015 GLOBAL SETTLEMENT BETWEEN THE DFFA AND THE CITY OF DETROIT RESOLVING THAT PORTION OF DFFA CLAIM NO. 2812 RELATED TO THE GRIEVANCE FILED ON BEHALF OF FIRE FIGHTER BRADLEY SMOLA AND REQUIRING SMOLA'S REINSTATEMENT AND FOR RELATED RELIEF

The City of Detroit, Michigan ("<u>City</u>") and the Detroit Fire Fighters Association ("<u>DFFA</u>"), by their undersigned counsel, hereby stipulate and agree as follows:

- 1. On March 15, 2017, the DFFA filed the Motion for Entry of an Order Enforcing the November 30, 2015 Global Settlement Between the DFFA and the City of Detroit Resolving That Portion of DFFA Claim No. 2812 Related to the Grievance Filed on Behalf of Detroit Fire Fighter Bradley Smola and Requiring Smola's Reinstatement and for Related Relief ("Motion") [Doc. No. 11811].
  - 2. The City filed its response on April 5, 2017 [Docket No. 11837].

- 3. The matter is currently set for hearing on Wednesday, July 19, 2017, and the Court has set the deadline for the DFFA to file its reply brief as July 11, 2017 [Docket No. 11904].
- 4. The parties have conferred and have agreed to adjourn the hearing until Wednesday, August 23, 2017 at 1:30 p.m. and further ask that the Court extend the deadline for the DFFA to file its reply to the City's response to the Motion through and including August 16, 2017.

WHEREFORE, the Parties respectfully request that the Court enter an order adjourning the hearing on the Motion to August 23, 2017 at 1:30 p.m. and extending the deadline for the DFFA to file its reply to the City's response to the Motion through and including August 18, 2017, in substantially the same form as the proposed order attached as Exhibit 1.

### STIPULATED AND AGREED TO ON July 10, 2017:

## LAW OFFICE OF BARBARA A. PATEK, P.L.C.

By: /s/ Barbara A. Patek
Barbara A. Patek, Esq.
Law Office of Barbara A. Patek, P.L.C.
27 E. Flint Street, Suite 2
Lake Orion, Michigan 48362
Telephone: (248) 814-9470
pateklaw@gmail.com

Counsel for Detroit Fire Fighters Association

### MILLER CANFIELD PADDOCK & STONE, PLC

By: /s/ Marc N. Swanson Marc N. Swanson (P71149) 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 496-7591 Facsimile: (313) 496-8451

swansonm@millercanfield.com

Counsel for the City of Detroit, Michigan

#### **EXHIBIT 1**

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

Bankruptcy Case No. 13-53846

City of Detroit, Michigan,

Judge Thomas J. Tucker

Debtor.

Chapter 9

ORDER GRANTING THIRD ADJOURNMENT OF HEARING DATE AND EXTENSION OF THE DEADLINE TO FILE REPLY TO RESPONSE TO MOTION OF THE DETROIT FIRE FIGHTERS ASSOCIATION, IAFF LOCAL 344 ("DFFA") FOR ENTRY OF AN ORDER ENFORCING THE NOVEMBER 30, 2015 GLOBAL SETTLEMENT BETWEEN THE DFFA AND THE CITY OF DETROIT RESOLVING THAT PORTION OF DFFA CLAIM NO. 2812 RELATED TO THE GRIEVANCE FILED ON BEHALF OF FIRE FIGHTER BRADLEY SMOLA AND REQUIRING SMOLA'S REINSTATEMENT AND FOR RELATED RELIEF

Upon the Stipulation for Order Granting Third Adjournment of Hearing Date and Extension of the Deadline to File Reply to Response to Motion of the Detroit Fire Fighters Association, IAFF Local 344 ("DFFA") for Entry of an Order Enforcing the November 30, 2015 Global Settlement Between the DFFA and the City of Detroit resolving That Portion of DFFA Claim No. 2812 Related to the Grievance Filed on Behalf of Detroit Fire Fighter Bradley Smola and Requiring Smola's Reinstatement and for Related Relief [Doc. No. 11811] ("Motion"); and the Court being otherwise advised in the premises;

IT IS ORDERED THAT the hearing on the Motion now set for July 19, 2017 at 1:30 p.m. is adjourned to August 23, 2017 at 1:30 p.m.;

IT IS FURTHER ORDERED THAT the deadline for the DFFA to file its reply to the City's response to the Motion is hereby extended through and including August 16, 2017.